

SR 8832

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JOHN ALEXANDER and BRAULIA ALEXANDER,

Plaintiffs,

- against -

AMCHEM PRODUCTS, INC., et al.,

Defendants.
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**PLAINTIFFS' AFFIRMATION
IN SUPPORT OF THEIR
MOTION TO REMAND**

Case No. 07 CV 6441 (PKC)

STEPHEN J. RIEGEL, an attorney duly admitted to practice law in this Court and the Courts of the State of New York, hereby affirms the following to be true under penalty of perjury:

1. I am associated with the law firm of Weitz & Luxenberg, P.C., attorneys for Plaintiffs John Alexander and Braulia Alexander, and as such am fully familiar with all prior pleadings and proceedings here and in the court below.

2. I make this affirmation in support of Plaintiffs' motion to remand this case to New York Supreme Court, County of New York, where it was originally filed and subsequently removed to this Court by Defendants General Motors Corporation and Ford Motor Company by their Notice of Removal, filed here on or about July 16, 2007.

3. Appended at Exhibit 1 hereto are copies of the pages of the transcript of the deposition of Plaintiff John Alexander, on January 30, 2007, which are cited to in Plaintiffs' Memorandum of Law In Support of Their Motion to Remand ("Plaintiffs' Memorandum of

Law”).

4. Appended at Exhibit 2 hereto are copies of shipping records and invoices of Union Carbide Corporation referencing shipments and sales of its Calidria asbestos fibers to the Chrysler Corp. facility in Trenton, Michigan, which are cited to in Plaintiffs’ motion papers.

5. Appended at Exhibit 3 hereto is a copy of DaimlerChrysler Corporation’s Responses To Plaintiffs’ First Master Set of Interrogatories in Coleman v. A.C. Delco, et al., Case No. CV 408170 (Court of Common Pleas, Cayuga Co., Ohio), dated November 30, 2000, which is cited to in Plaintiffs’ Memorandum of Law.

6. Appended at Exhibit 4 hereto is a copy of the Decision, dated April 13, 2007, in Convertino v. Union Carbide Corp., Index No. 2006-1322, mem. op. (Sup. Ct. Saratoga Co.), which is cited to in Plaintiffs’ Memorandum of Law.

Dated: New York, N.Y.
July 30, 2007



Stephen J. Riegel